1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

26

RENE L. VALLADARES
Federal Public Defender
Nevada State Bar No. 11479
BRANDON C. JAROCH
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Brandon Jaroch@fd.org

Attorney for Juan Jose Moreno-Gallardo

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

v.

JUAN JOSE MORENO-GALLARDO,

Defendant.

Case No. 2:20-mj-00948-NJK

STIPULATION TO CONTINUE PRELIMINARY HEARING (Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Brandon C. Jaroch, Assistant Federal Public Defender, counsel for Juan Jose Moreno-Gallardo, that the Preliminary Hearing currently scheduled on February 19, 2021, be vacated and continued to a date and time convenient to the Court, but no sooner than ninety (90) days.

This Stipulation is entered into for the following reasons:

- 1. Counsel for the defendant needs additional time to conduct investigation in this case.
  - 2. Defendant is incarcerated and does not object to a continuance.
  - 3. The parties agree to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the second request for continuance filed herein.

DATED this 16<sup>th</sup> day of February, 2021.

RENE L. VALLADARES Federal Public Defender NICHOLAS A. TRUTANICH United States Attorney

By <u>/s/ Brandon C. Jaroch</u>
BRANDON C. JAROCH
Assistant Federal Public Defender

By <u>/s/ Jared Grimmer</u>

JARED GRIMMER
Assistant United States Attorney

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

ORDER

Case No. 2:20-mj-00948-NJK

v.

JUAN JOSE MORENO-GALLARDO,

Defendant.

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on February 19, 2021 at the hour of 4:00 p.m., be vacated and continued to May 25, 2021, at 4:00 p.m., in Courtroom 3C.

DATED this 17th day of February, 2021.

UNITED STATES MAGISTRATE JUDGE